

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

IN RE BROILER CHICKEN ANTITRUST
LITIGATION

This Document Relates to:

WZ Franchise Corporation v. Tyson Foods, Inc.
et al., Case No. 1:20-cv-05204

Civil Action No. 1:16-cv-08637

Judge Thomas M. Durkin
Magistrate Judge Jeffrey T. Gilbert

Jury Trial Demanded

AMENDED COMPLAINT

1. Plaintiff WZ Franchise Corporation (“Wing Zone”) hereby amends its Complaint (ECF 1) in Case No. 1:20-cv-05204, and its claims and allegations in the Direct Action Plaintiffs’ Amended Consolidated Complaint and Demand for Jury Trial, filed in *In re Broiler Antitrust Litigation*, Case No. 1:16-cv-08637 (ECF 4243) (“DAP Amended Consolidated Complaint”), to name the following Defendants: Utrecht-America Holdings, Inc. and its subsidiaries, Rabo AgriFinance LLC, Rabobank USA Financial Corporation, and Utrecht-America Finance Co. (collectively “Rabobank”); and Keystone Foods LLC and its wholly owned subsidiaries and affiliated entities Keystone Foods Corporation, Equity Group Eufaula Division, LLC, Equity Group Kentucky Division LLC, and Equity Group Georgia Division LLC (collectively “Keystone”).

2. Wing Zone incorporates by reference the factual allegations and reservations of rights contained in the DAP Amended Consolidated Complaint, amending its row in Section II’s Chart of Direct-Action Plaintiff Cases as follows:

Plaintiff Name	Operative Complaint (Reference is to Sealed Version, if applicable)	Named Defendants (Not Previously Dismissed)	Named-Co-Conspirators (if any)	Causes of Action
WZ Franchise Corporation	ECF 3831-1	Agri Stats; Amick; Case; Claxton; Foster Farms; George's; Harrison; House of Raeford; Koch; Mar-Jac; Mountaire; O.K. Foods; Peco; Perdue; Pilgrim's; Sanderson; Simmons; Tyson; Wayne; Rabobank; Keystone	Allen Harim; Fieldale; Defendant Family Co-Conspirators	Count I (Sherman Act Claim for All Anticompetitive Conduct)

PRAYER FOR RELIEF

WHEREFORE, Wing Zone respectfully requests that the Court:

- A. Enter joint and several judgments against Defendants in favor of Wing Zone;
- B. Award Wing Zone damages in an amount to be determined at trial to the maximum extent allowed under federal antitrust laws, and enter a joint and several judgment in favor of Wing Zone against Defendants in an amount to be trebled as provided by law;
- C. Award Wing Zone post-judgment interest as provided by law, with such interest to be awarded at the highest legal rate;
- D. Award Wing Zone's attorneys' fees, litigation expenses, and costs, as provided by law; and
- E. Grant Wing Zone such other and further relief that the Court may deem just and proper.

JURY DEMAND

Pursuant to Federal Rule of Civil Procedure 38(b), Wing Zone demands a trial by jury on

all issues so triable.

Dated: March 1, 2021

Respectfully submitted,

WZ FRANCHISE CORPORATION

By: /s/ Lori P. Lustrin
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